

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MARANDA LYNN O'DONNELL, ET AL.

Plaintiffs,

V.

HARRIS COUNTY, TEXAS, ET AL.

Defendants.

[illegible]

Case No. 16-cv-01414

**THE ATTORNEY GENERAL OF TEXAS'S
CORRECTED MOTION TO VACATE CONSENT DECREE**

The Attorney General of Texas, Ken Paxton, hereby moves to terminate or dissolve the consent decree. *See* Dkt. No. 708 (“Consent Decree”). The Court should grant this corrected¹ motion because, as the Fifth Circuit held in *Daves v. Dallas County*, 64 F.4th 616, 631 (5th Cir. 2023) (*en banc*), the Court should not have exercised jurisdiction, and Senate Bill 6 (“S.B. 6”) rendered plaintiffs’ claims moot. Alternatively, dissolution is warranted under Federal Rule of Civil Procedure 60(b) given intervening changes in state law.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

¹ On August 26, 2025, the Attorney General mistakenly filed a version of this Motion to Vacate and supporting memorandum with a non-substantive error: inclusion of the Certificate of Conference meant for the contemporaneously filed Motion to Intervene. This corrected motion removes the incorrect Certificate of Conference from both the motion and the accompanying memorandum.

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/s/Joe Nwaokoro
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COUNSEL FOR THE ATTORNEY GENERAL
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CERTIFICATE OF SERVICE

I certify that on this 26th day of August 2025, a true and correct copy of the foregoing document was filed and served via the Court's CM/ECF system to all counsel of record.

/s/ Joe Nwaokoro
Joe Nwaokoro
Assistant Attorney General